

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

	)	
UNITED STATES OF AMERICA,	)	
ACTING THROUGH THE UNITED	)	ANSWER
STATES DEPARTMENT OF	)	
AGRICULTURE	)	
	)	
Plaintiff	)	MIDCOAST FEDERAL CREDIT UNION
v.	)	
	)	
BARBARA E. NEWBEGIN F/K/A	)	Case No. 2:25-cv-00323-LEW
BARBARA E. BREWER	)	
	)	
Defendant	)	
And	)	
	)	
MIDCOAST FEDERAL CREDIT UNION	)	
	)	
Party in Interest	)	

NOW COMES Party in Interest, Midcoast Federal Credit Union (hereinafter “MFCU”), by and through its duly authorized counsel, DRUMMOND, WOODSUM & MACMAHON, and hereby answers Plaintiff United States of America (hereinafter “Plaintiff”)’s Complaint as follows:

1. MFCU admits the allegations contained in paragraph 1 of Plaintiff’s Complaint.
2. MFCU has insufficient knowledge and therefore denies the allegations contained in paragraph 2 of Plaintiff’s Complaint.
3. MFCU has insufficient knowledge and therefore denies the allegations contained in paragraph 3 of Plaintiff’s Complaint.
4. MFCU admits the allegations contained in paragraph 4 of Plaintiff’s Complaint.
5. MFCU has insufficient knowledge and therefore denies the allegations contained in paragraph 5 of Plaintiff’s Complaint.

6. MFCU has insufficient knowledge and therefore denies the allegations contained in paragraph 6 of Plaintiff's Complaint.

7. MFCU has insufficient knowledge and therefore denies the allegations contained in paragraph 7 of Plaintiff's Complaint.

8. MFCU has insufficient knowledge and therefore denies the allegations contained in paragraph 8 of Plaintiff's Complaint.

9. MFCU admits the allegations contained in paragraph 9 of Plaintiff's Complaint.

10. MFCU has insufficient knowledge and therefore denies the allegations contained in paragraph 10 of Plaintiff's Complaint.

11. MFCU has insufficient knowledge and therefore denies the allegations contained in paragraph 11 of Plaintiff's Complaint.

12. MFCU has insufficient knowledge and therefore denies the allegations contained in paragraph 12 of Plaintiff's Complaint.

13. MFCU has insufficient knowledge and therefore denies the allegations contained in paragraph 13 of Plaintiff's Complaint.

14. MFCU has insufficient knowledge and therefore denies the allegations contained in paragraph 14 of Plaintiff's Complaint.

15. MFCU has insufficient knowledge and therefore denies the allegations contained in paragraph 15 of Plaintiff's Complaint.

16. MFCU has insufficient knowledge and therefore denies the allegations contained in paragraph 16 of Plaintiff's Complaint.

17. MFCU has insufficient knowledge and therefore denies the allegations contained in paragraph 17 of Plaintiff's Complaint.

WHEREFORE, in the event that the Court enters an order to sell the Property described in the Complaint by judicial sale, MFCU requests:

- A. That the Court determine the relative priority of the mortgages of each party; and
- B. That the Court order a distribution to MFCU of any proceeds consistent with the Court's determination of such priority.

Dated at Portland, Maine, this 31<sup>st</sup> day of July, 2025

/s/ Christopher L. Brooks, Esq

Christopher L. Brooks, Esq. (Bar No. 4637)  
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**CERTIFICATE OF SERVICE**

I, Christopher L. Brooks, Esq., hereby certify that on this 31<sup>st</sup> day of July, 2025, I served a copy of the above document by electronic notification using the CM/ECF system and/or First Class Mail to the following:

United States of America  
Acting through the United States Department of Agriculture  
c/o Kevin J. Crosman, Esq.  
Jensen Baird Gardner & Henry  
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Barbara E. Newbegin  
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Bristol, Maine 04539

/s/ Christopher L. Brooks, Esq\_\_\_\_\_

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